

April 25, 2001

Mr. Jacob Warrington
Hayes-Lemmerz International, Inc.
1870 Riverfork Drive
Huntington, IN 46750

Dear Mr. Warrington:

Re: Exempt Construction and Operation Status,
069-13803-00031

The application from Hayes-Lemmerz International, Inc., received on January 22, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following proposed casting units, to be located at 1870 Riverfork Drive in Huntington, Indiana 46750, are classified as exempt from air pollution permit requirements:

Six (6) electric low pressure aluminum wheel casting units, each with a maximum design throughput of 60 wheels/hr.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (2) Pursuant to 326 IAC 6-4, the Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.
- (3) Pursuant to 326 IAC 2-6, the Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (a) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (b) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (c) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (d) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (4) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from all six casting units shall not exceed 12.69 pounds per hour.

This existing source has submitted their Part 70 application (T 069-7421-00031) on December 10, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality
Original Signed by Paul Dubenetzky

SDF

cc: File - Huntington County
Huntington County Health Department
Air Compliance - Ryan Hillman
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak
Part 70 Application File - T-069-7421-00031

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Exempt Status

Source Background and Description

| | |
|--|--|
| Source Name: | Hayes-Lemmerz International, Inc. |
| Source Location: | 1870 Riverfork Drive, Huntington, IN 46750 |
| County: | Huntington |
| SIC Code: | 3663 |
| Operation Permit No.: | T 069-7421-00031 |
| Operation Permit Issuance Date: | Pending |
| Exemption No.: | 069-13803-00031 |
| Permit Reviewer: | SDF |

The Office of Air Quality (OAQ) has reviewed an exemption application from Hayes-Lemmerz International, Inc. relating to the installation of the following to their existing aluminum wheel manufacturing operation.

Six (6) electric low pressure aluminum wheel casting units, each with a maximum design throughput of 60 wheels/hr.

History

On January 22, 2001, Hayes-Lemmerz International, Inc. submitted an application to add six low pressure aluminum wheel casting units to their existing aluminum wheel manufacturing operation.

The maximum throughput for each casting unit is 1,800 lb/hr (60 wheels/hr) or a combined total of 10,800 lbs/hr. The addition of the six casting units will not allow an increase in throughput to the other processes of the source because the source already is permitted to produce aluminum wheels at its maximum furnace capacity of 19,000 pounds of aluminum per hour.

Thus, the emissions generated by the proposed modification are the emissions generated by the six proposed casting units.

The proposed units are being permitted under an exemption pursuant to 326 IAC 2-1.1-3 because the source Title V operating permit is still pending and the unrestricted potential to emit of all criteria and hazardous air pollutants are less than the levels specified in 326 IAC 2-1.1-3(d).

Existing Approvals

The source has submitted an application for a Title V permit (T 069-7421-00031) which is still pending. The source has been operating under the following approvals including, but not limited to:

1. Letter transferring permits from Aluminum Conversion, Inc. to Western Wheel, Huntington, issued on September 13, 1988.
2. OP No. 35-01-93-0174, issued on October 17, 1989.
3. RP No. 069-2096-00031, issued on April 21, 1992.

4. Name change from Western Wheel Huntington, Inc. to Hayes Wheels International, Inc., issued on February 23, 1993.
5. EP No. 069-2921-00031, issued on March 26, 1993.
6. CP No. 069-3011-00031, issued on November 19, 1993.
7. RP No. 069-3712-00031, issued on July 15, 1994.
8. CP No. 069-4665-00031, issued on October 26, 1995.
9. A069-5245-00031, an amendment to CP No. 069-4665-00031, issued on February 9, 1996.
10. Amendment to CP No. 069-4665-00031, issued on April 10, 1996.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Exemption be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

Emission Calculations

UNRESTRICTED POTENTIAL TO EMIT DUE TO THE MODIFICATION:

The emissions generated by the proposed modification are the emissions from the six proposed casting units.

Criteria Pollutants:

The following calculations determine the unrestricted PTE from the proposed casting units based on a combined maximum throughput of 5.4 tons/hr, oxides of nitrogen (NO_x) sulfur dioxide (SO₂), and volatile organic compounds (VOC) emission factors from the FIRE database, version 6.01 (SCC 30400114), PM and PM₁₀ emission factors based on approved test data, emissions before controls, and 8,760 hours of operation.

$$5.4 \text{ tons metal/hr} * 8760 \text{ hr/yr} * \text{Ef lb poll./ton metal} * 1/2000 \text{ tons poll./lb poll.} = \text{ton poll./yr}$$

| | PM 0.049 lb/ton | PM10 0.049 lb/ton | SO2 0.02 lb/ton | NOx 0.01 lb/ton | VOC 0.14 lb/ton |
|---------|--------------------|----------------------|--------------------|--------------------|--------------------|
| tons/yr | 1.16 | 1.16 | 0.47 | 0.24 | 3.31 |

* PM is determined to be equal to PM₁₀ in this case.

The emissions are uncontrolled.

Hazardous Air Pollutants (HAP):

The following calculations determine the unrestricted HAP emissions based on the respective maximum hourly emission rates, emissions before controls, and 8,760 hours of operation.

$$\text{Tons HAP/yr} = \text{lb HAP/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ tons HAP/lb HAP}$$

| Pollutant | Max. HAP Rate (lb/hr) | HAP tons/yr |
|--------------|-----------------------|--------------|
| Beryllium | 3.52 E-6 | 1.54 E-5 |
| Manganese | 8.8 E-5 | 3.85 E-4 |
| Nickel | 4.4 E-5 | 1.93 E-4 |
| Total | | 0.001 |

The HAP emissions are uncontrolled.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | 1.16 |
| PM-10 | 1.16 |
| SO ₂ | 0.47 |
| VOC | 3.31 |
| CO | - |
| NO _x | 0.24 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| Pollutant | Potential To Emit (tons/year) |
|----------------|-------------------------------|
| Max Single HAP | 3.85 E-4 |
| Combined HAP | 0.001 |

Justification for Modification

The proposed casting units are being permitted through an exemption pursuant to 326 IAC 2-1.1-3(d) which states that the new source requirements for registrations (326 IAC 2-5.1-2), permits (326 IAC 2-5.1-3), modifications of 326 IAC 2-7-10.5, and the permit modification requirements of 326 IAC 2-6.1-6, 326 IAC 2-7-12, and 326 IAC 2-8-11.1 do not apply if the potential to emit of the new source or modification are less 5 tons/yr of particulate matter (PM) and PM10, 10 tons per year of sulfur dioxide (SO₂), oxides of nitrogen (NO_x), and volatile organic compounds (VOC), 25 tons/yr of carbon monoxide (CO), 1 ton/yr for any single hazardous air pollutant (HAP), and 2.5 tons/yr combined HAPs.

County Attainment Status

The source is located in Huntington County.

| Pollutant | Status |
|------------------|------------------------------|
| PM ₁₀ | attainment or unclassifiable |
| SO ₂ | attainment or unclassifiable |
| NO ₂ | attainment or unclassifiable |
| Ozone | attainment or unclassifiable |
| CO | attainment or unclassifiable |
| Lead | attainment or unclassifiable |

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Huntington County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant | Emissions (tons/year) |
|------------------|-----------------------|
| PM | 153.91 |
| PM ₁₀ | 153.91 |
| SO ₂ | 0.53 |
| VOC | 113.61 |
| CO | 4.56 |
| NO _x | 22.10 |

| Pollutant | Emissions (tons/year) |
|---------------|-----------------------|
| Glycol Ethers | 0.99 |
| Xylene | 0.04 |
| Chromium | 0.01 |
| Nickel | 0.08 |
| Total | 1.12 |

- (a) This existing source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This existing source is a Title V major stationary source because the PM, PM₁₀, and VOC emissions exceed the applicable level of 100 tons per year.

Potential to Emit of Source After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls.

| Process/facility | Potential to Emit (tons/year) | | | | | | |
|------------------------------------|----------------------------------|------------------|-----------------|---------------|-------------|-----------------|-------------|
| | PM | PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPs |
| Existing Source PTE | 153.91 | 153.91 | 0.53 | 113.61 | 4.56 | 22.10 | 1.12 |
| Source After Proposed Modification | 155.07 | 155.07 | 1.00 | 116.92 | 4.56 | 22.34 | 1.12 |

| | | | | | | | |
|--------------------------------|-----|-----|-----|----|-----|-----|--------------------|
| Part 70 Major Source Threshold | - | 100 | 100 | 25 | 100 | 100 | 10 ind. 25 tot. |
| PSD Threshold Level | 250 | 250 | 250 | 25 | 250 | 250 | - |

- (a) The maximum source metal production rate shall remain at 19,000 pounds of aluminum per hour. Thus, the only increase in emissions is due to the proposed casting units.
- (b) This modification to an existing PSD minor stationary source is not major because the emissions after the modification are less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.
- (c) This modification will not change the stationary source operating status because the PM₁₀ and VOC emissions from the entire source will still be greater than the Part 70 major source thresholds.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12)(40 CFR Part 60) applicable to this source because there are no NSPS that apply to secondary aluminum facilities.

State Rule Applicability

Entire Source:

Opacity Limitations (326 IAC 5-1):

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

Fugitive Dust (326 IAC 6-4):

Pursuant to 326 IAC 6-4, the Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.

326 IAC 2-6 (Emission Reporting):

The source is subject to 326 IAC 2-6 because the volatile organic compound (VOC) and PM10 PTE, each, are greater than the applicable level of 100 tons/yr.

Pursuant to 326 IAC 2-6, the Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (a) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (b) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (c) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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Indianapolis, Indiana 46206-6015

- (d) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

Individual Facilities:

The proposed casting units are subject to 326 IAC 6-3 (Process Operations).

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from all six casting units (process weight rate of 10,800 lb/hr) shall not exceed 12.69 pounds per hour.

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where: E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour (5.4 tons/hr)

The combined unrestricted potential to emit from the 6 proposed casting units is estimated to be 1.16 tons/yr (0.26 lb/hr) which is less than the limited level of 12.69 lb/hr. Thus, compliance is determined to be achieved.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

There are no new compliance requirements or changes to the existing compliance monitoring requirements that are necessary due to the proposed casting units.

Conclusion

The operation of this proposed modification shall be subject to the conditions of the attached proposed 069-13803-00031.